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February 6, 2003

Commissioner Kathleen Abernathy
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

EX PARTE

Re: CC Docket No. 01-338
Response to ITC^DeltaCom's ex parte filed January 24, 2003

Dear Commissioner Abernathy:

In a recent ex parte letter addressed to you, ITC^DeltaCom asserted that the use of UNE-L to provision residential and small business customers is not economically viable *even where a CLEC already has switches installed.* Part of ITC^DeltaCom's analysis focuses on the fact that, given existing below-cost UNE-P rates, the up-front costs of servicing a new customer over UNE-L are higher than by UNE-P. BellSouth does not dispute this point. Indeed, we believe ITC^DeltaCom's argument demonstrates clearly why CLECs never will have incentive to deploy facilities so long as UNE-P is available at TELRIC rates.[1] The remainder of ITC^DeltaCom's ex parte asserts that provisioning and technical issues makes reliance on UNE-L not a viable option for CLECs. Because BellSouth is specifically identified by ITC^DeltaCom in connection with these issues, we feel compelled to respond to a number of inaccuracies in that letter.

"Geographic Dispersion" of Wire Centers

ITC^DeltaCom contends that the "geographic dispersion of BellSouth's wire centers" and the "size of the market at each end user service wire center" are barriers to UNE-L being a viable option for competition. BellSouth disagrees. ITC^DeltaCom has constructed an extensive fiber network, with eleven switches and many additional points

[1] It is worth noting that of the $229.40 which ITC^DeltaCom cites as the non-recurring cost differential between UNE-P and UNE-L, $140 (or more than 60%) are internal to ITC^DeltaCom—not charges from BellSouth. ITC^DeltaCom's point appears to be that they are entitled to do business without investing more than a nominal amount to acquire new customers.

of presence in BellSouth's nine-state region. Attached as Exhibit A is a map from ITC^DeltaCom's web site that shows ITC^DeltaCom's Fiber Optic Network.

Because ITC^DeltaCom has filed testimony emphatically stating that it can serve large geographic areas from a single switch, and do so more economically than the ILEC, it is disingenuous for ITC^DeltaCom to now claim that it cannot compete due to the "geographic dispersion of BellSouth's wire centers." ITC^DeltaCom and other CLECs participated in state proceedings wherein company representatives adamantly insisted that unbundled loop rates must be deaveraged such that the geographic dispersion of BellSouth's wire centers would be reflected in the UNE loop rates. Each state commission in BellSouth's region established UNE loop rates for at least three geographic zones.[2] Indeed, in arbitration hearings with BellSouth at the state level, witnesses for ITC^DeltaCom stated:

> ITC^Deltacom, like many new entrant CLECs, generally deploys its individual switches to cover a large geographic area served by a common transport network. The advent of fiber optic technologies and multi-function switching platforms have, in many cases, allowed carriers like ITC^DeltaCom to serve an entire statewide or LATA-wide customer base from a single switch platform. Likewise, the ability to aggregate unbundled loops from collocations within a number of ILEC central offices while transporting that traffic to a single location that allows these carriers to originate, switch and terminate traffic between callers located many miles apart with a single switch.[3]

At the time this testimony was filed, the issue between BellSouth and ITC^DeltaCom was whether BellSouth should pay ITC^DeltaCom a reciprocal compensation rate based upon the recovery of tandem, transport and end office termination costs. ITC^DeltaCom contended that it should receive payment for all three components based on its stated ability to serve a geographic area comparable to the area served by BellSouth. Indeed, when asked how ITC^DeltaCom could provision so many functions from a single switch when BellSouth requires additional [i.e., tandem] switches, ITC^DeltaCom's witness replied:

> Simply put, the economics of network construction have changed since the time that the majority of the Bellsouth network was put in place, allowing new and very different network architectures. ... At the time the majority of the ILEC network was built, switches were very limited in the number of individual lines they could service and copper plant was the most expensive portion of the network to deploy. Therefore, ILECs chose to trade switching costs for copper

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[2] Due to the large amount of rural area in Mississippi, the Mississippi Public Service Commission established four zones.

[3] Direct Testimony of Michael Starkey on Behalf of ITC^DeltaCom Communications, Inc., September 3, 1999, in Louisiana Docket No. U-24206 (page 24).

> plant costs by deploying greater numbers of switches and shorter copper loops. However, with the advent of relatively inexpensive fiber optic transport facilities and the enormous switching capacity available in today's switching platforms, the economics of the switch/transport tradeoff have changed. CLECs today are able to perform many of the same functions with a single switch that may be performed by at least two switches in the BellSouth network.[4]

Further, an ITC^DeltaCom witness testified that "ITC^DeltaCom has spent millions of dollars building a network to provide telecommunications services and to handle the traffic of its customers and the traffic of other carriers."[5]

In response to ITC^DeltaCom's contention that "the size of the market at each end user serving wire center" is a barrier to competition, BellSouth points to its ex parte filings made on January 15, 2003 and January 30, 2003 wherein BellSouth provided an analysis that clearly shows that CLECs can economically serve customers in wire centers with greater than 5,000 total lines.

Hot Cut Performance

Next, ITC^DeltaCom contends that the costs and reliability of BellSouth's hot cut process precludes UNE-L as an option for competitors. Of course, state commissions established BellSouth's rates in proceedings wherein all interested CLECs participated. Indeed, ITC^DeltaCom has participated in many of those proceedings in BellSouth's region. Moreover, all of BellSouth's provisioning rates have been confirmed by the FCC as satisfying TELRIC in the context of our 271 approvals.

ITC^DeltaCom erroneously contends that the UNE-P process is considerably more mature than the UNE-L process. In fact, BellSouth's processes for "hot cuts" for unbundled loops predate BellSouth's processes for UNE-P conversion and, therefore, are more mature than UNE-P processes. More importantly, BellSouth's UNE-L provisioning processes have been tested and improved over time and provide consistent, high quality, and timely loop cutovers. The third party testing that BellSouth's processes underwent in Georgia and Florida confirmed that the processes worked effectively and provided CLECs with nondiscriminatory access to unbundled loops.

ITC^DeltaCom presents no data to support its contention that BellSouth's hot cut process is unreliable. In fact, BellSouth's hot cut process is extremely reliable, as is evidenced by data filed with BellSouth's various section 271 applications. **[Haven't we filed data in the Triennial Review to show how good we are at hot cuts? Need help here.]** Indeed, BellSouth's loop provisioning and hot cut processes are efficient and scaleable, and were designed with CLEC input and under state commission supervision.

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4 *Id.*, pages 26-27.

5 Rebuttal Testimony of Christopher Rozycki on Behalf of ITC^DeltaCom Communications, Inc., July 26, 1999, in North Carolina Docket No. P-500, Sub 10 (page 14).

BellSouth is committed to meeting the performance measurements standards, and to assist in that goal, BellSouth conducts daily internal hot cut quality reviews. BellSouth's performance measurements include a broad set of loop provisioning measures and standards, and significant penalties apply when hot cuts are missed ($400 per affected hot cut in first month, increasing to $800 per cut missed).

Nor does ITC^DeltaCom provide any support for its allegation that "BellSouth is often late in arriving for cut [that is, a hot cut]." BellSouth's performance data indicates otherwise. In fact, BellSouth's performance in the area of Hot Cut Timeliness is exceptional. For the period October 2002 through December 2002, BellSouth's performance data indicates that 99.84% of all Hot Cuts were started on time. This means that the cuts started within 15 minutes before or after the appointed time. The data also indicates that 99.90% of all Hot Cuts were completed on time. This means that the cuts were completed within 15 minutes of the start of the cut. BellSouth's hot cut procedures, which were developed jointly with CLECs, have been perfected over time such that BellSouth provides timely, accurate hot cuts. Rather than presenting data to demonstrate that BellSouth's processes are deficient (data that ITC^DeltaCom would possess if such existed because all CLECs have access to BellSouth's performance metrics), ITC^DeltaCom relies on completely unsupported allegations.

The simple fact is that BellSouth performance in provisioning UNE-L has satisfactorily met every challenge to date. On the other hand, ITC^DeltaCom—like the other CLECs making these types of assertion—have provided not a shred of evidence into the voluminous record of this proceeding to show that BellSouth could not scale its hot cut efforts to meet any anticipated demand.

Loop Quality

ITC^DeltaCom's expresses its view that "BellSouth is not currently required to provide equivalent service on the UNE-L platform and parity of service does not exist." While BellSouth is not sure what ITC^DeltaCom means by the term "UNE-L platform," BellSouth states unequivocally that it does provide loops to CLECs on a non-discriminatory basis, as is required by the Act and by the FCC's rules. Indeed, many of the alleged "problems" discussed by ITC^DeltaCom can be traced to ITC^DeltaCom's apparent insistence on using voice grade loops (that meet the required technical standards) to provides specific services that actually require a higher grade of loop. Copper loops, UDLC loops, and IDLC loops are all standard voice grade loops, and each of these loop types meet industry standards for voice grade service. The bottom line is that, contrary to ITC^DeltaCom's assertion, the unbundled loops that BellSouth provides to CLECs must meet minimum technical specifications for the loop type ordered. On its interconnection website, BellSouth provides the technical specifications for each of its various unbundled loop products.

Although it is not clear from ITC^DeltaCom's ex parte, the discussion under the heading of UNE-L As Deployed Currently relates to the situation wherein a customer switching its local service to a CLEC is currently being served via integrated digital loop

carrier ("IDLC") by BellSouth. Of course, when an end user switches its service to a CLEC, BellSouth's first choice is to unbundle the loop that is currently providing service to the end user, and provide that unbundled loop to the CLEC. As ITC^DeltaCom is aware, if the customer is currently served via IDLC, the loop is integrated into the switch, and additional action is required in order to unbundled the loop. Therefore, when a CLEC obtains a customer that is currently served via IDLC, it is necessary to provide a non-integrated facility to serve the customer. BellSouth has been proactive in finding solutions to ensure that all of its loops, including those provided via IDLC equipment, may be provided on an unbundled basis. There simply is no voice grade loop quality of service issue.

Loop Makeup ("LMU") data can provide a CLEC such as ITC^DeltaCom with information to determine the suitability of particular loops. LMU provides existing loop configuration information, and CLECs can use the LMU capabilities to determine if spare copper loops exist at the customer's location. CLECs can also obtain LMU information for any available spare pairs, and the CLEC can reserve a spare pair for its exclusive use.

BellSouth has numerous alternatives for ensuring that all of its loops, including those served by IDLC equipment, can be made available to CLECs on an unbundled basis. These alternatives are:

- Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.

- Alternative 2: Where the loops are served by Next Generation Digital Loop Carrier ("NGDLC") systems, BellSouth will "groom" the integrated loops to form a virtual Remote Terminal ("RT") arranged for universal service (that is, a terminal which can accommodate both switched and private line circuits). "Grooming" is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC). Both of the NGDLC systems currently approved for use in BellSouth's network have "grooming" capabilities.

- Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare universal digital loop carrier equipment in the loop feeder route or Carrier Serving Area ("CSA"). For two-wire ISDN loops, the universal digital loop carrier facilities will be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.

- Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access ("INA") systems or other existing IDLC that terminates on Digital Cross Connect ("DCS") equipment. BellSouth will thereby route the requested unbundled loop channel for delivery to the requesting CLEC or for termination in a DLC channel

bank in the central office for concentration and subsequent delivery to the requesting CLEC.

- Alternative 5: When IDLC terminates at a peripheral capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC.

- Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable.

- Alternative 7: BellSouth will install and activate new Universal DLC ("UDLC") facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems.

- Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC.

Other Provisioning Issues

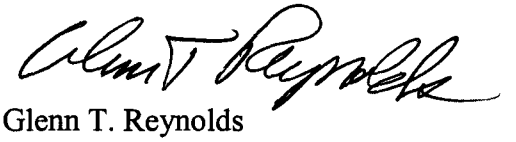
ITC^DeltaCom contends that BellSouth does not have an OSS infrastructure in place that adequately supports UNE-L and, as a result, states that there are unnecessary additional expenses imposed on the CLEC in the provisioning process. BellSouth's Operations Support Systems ("OSS") were the subject of intense review in each of BellSouth's successful Section 271 applications. All nine state Public Service Commissions concluded, after exhaustive review, that BellSouth's OSS provided CLECs with nondiscriminatory access to unbundled network elements and interconnection. The Georgia and Florida Commissions sponsored extensive third party testing of the systems ITC^DeltaCom refers to and likewise found BellSouth's OSS to be providing nondiscriminatory access. ITC^DeltaCom was actively involved in both the third party testing and the state Public Service Commission reviews of BellSouth's Section 271 applications. There is no merit to ITC^DeltaCom's contention regarding BellSouth's OSS.

Equally unfounded is ITC^DeltaCom's assertion that there are problems with Pending Facilities, resulting in BellSouth having to re-engineer for minimum standard copper. The incidence of encountering a shortage of facilities (resulting in an order being coded as "Pending Facilities") is minimal. BellSouth's performance data indicates that approximately 0.14% of CLEC orders for analog loops were delayed due to Pending Facilities during the time period October 2002 through December 2002. This compares

to 0.08% of BellSouth Retail orders being delayed for Pending Facilities during this period. This shows that the number of orders being delayed for Pending Facilities is very small in either situation.

In conclusion, contrary to ITC^DeltaCom's unsupported assertions, the FCC and each of BellSouth's nine state commissions have found that BellSouth provides nondiscriminatory access to unbundled network elements, including loops. The provisioning problems asserted by ITC^DeltCom—without any factual support—simply do not exist.

Sincerely,



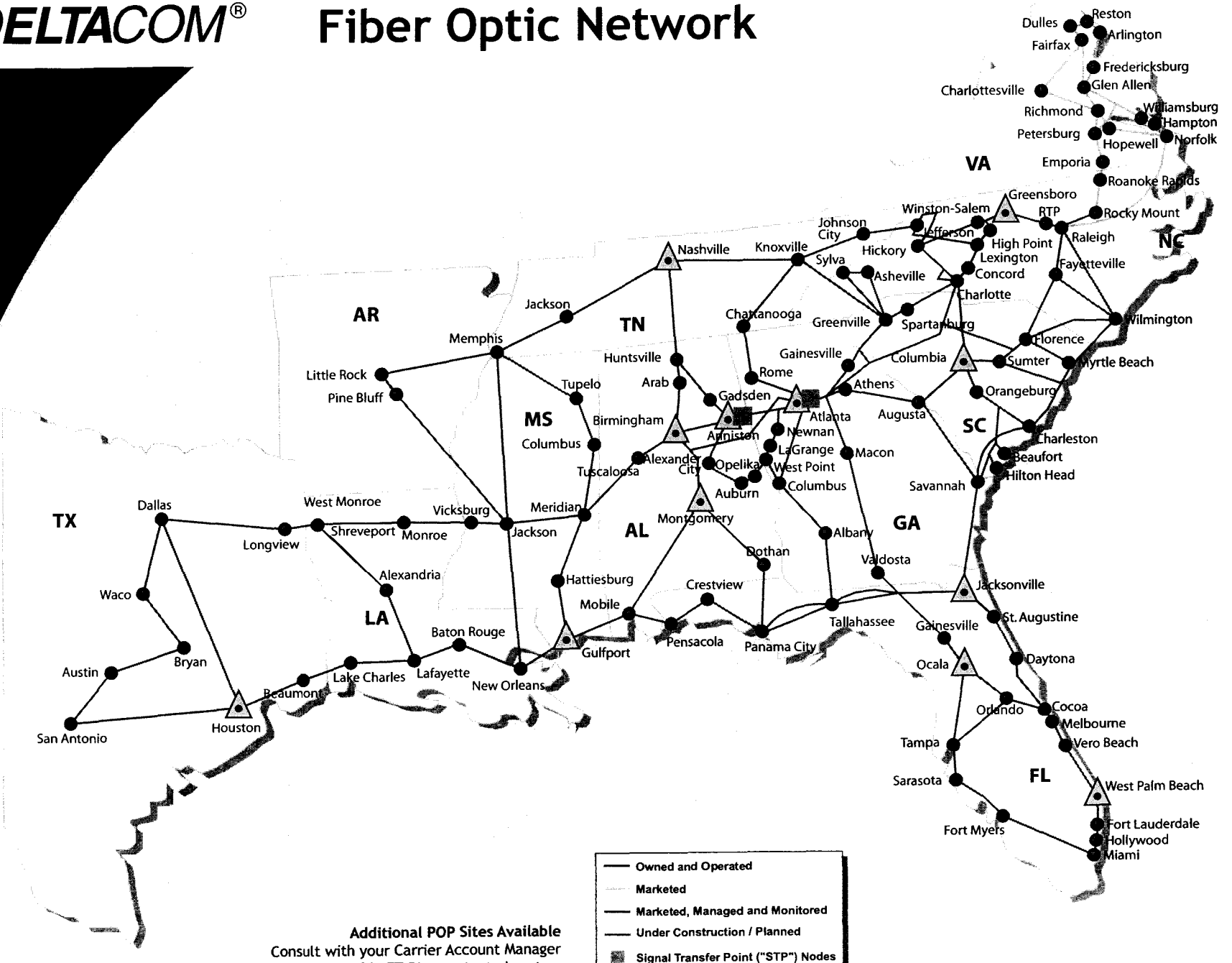
Glenn T. Reynolds

cc: Matthew Brill
Christopher Libertelli
Jordan Goldstein
Dan Gonzalez
Lisa Zaina
William Maher
Jeffery Caslisle
Scott Bergmann
Michelle Carey
Brent Olson
Tom Navin
Jeremy Miller

ATTACHMENT A

ITC DELTACOM®

Fiber Optic Network



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01/17/03

ATTACHMENT B

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December 24, 2002

54b

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte in WC Docket No. 01-338

Dear Ms Dortch:

On December 23, 2002, Pete Martin, Jonathan Banks, Keith Milner, Ken Ainsworth and the undersigned met with William Maher, Jeffrey Carlisle and Rich Lerner of the Wireline Competition Bureau.

The purpose of this meeting was to discuss BellSouth's ability to hot-cut UNE-P to UNE-L lines, as well as BellSouth retail to UNE-L lines, in a timely and efficient manner. Details of the discussion are summarized in the attached document.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place them in the record of the proceeding identified above.

Sincerely,

Robert T. Blau/all

Attachment

cc: William Maher
Jeffrey Carlisle
Rich Lerner

Structure of Presentation

- Loop provisioning issues such as hot cut capacity do not support a finding of switch impairment
- Proper framework for UNE-P transition will recognize FCC, PSC and carrier work to-date and create incentives that focus parties on implementation not regulatory posturing
- Focus on UNE-P competitors over competition interferes with public interest goal – ILECs losing more lines to wireless, cable and broadband than to synthetic UNE-P

Today's Loop Provisioning and Hot Cut Processes Are Efficient

- BLS hot cut and loop provisioning processes designed with CLEC input and under PSC supervision to be efficient
  - State proceedings reviewed loop provisioning and hot cut processes
    - Louisiana workshops
    - Georgia hot cut reconciliation process
    - Arbitrations
  - Third-party testing of provisioning processes
- Daily internal hot cut quality reviews
- TELRIC pricing reimburses only most efficient costs

Today's Loop Provisioning and Hot Cut Processes And Performance Are Reliable

- The data show continuing excellent performance
  - BellSouth's performance has passed close state and federal scrutiny for the last year
    - Hot cut on time performance : 99.93% (BST Region – 10/02)
    - % Provisioning Troubles Within 7 days – 2.3 % (BST Region –10/02)
- Performance measures and penalties put in place by PSCs with CLEC input guarantee continued excellent performance
  - Broad set of loop provisioning measures and standards
  - Meaningful penalties, e.g., $400/affected hot cut in first month increasing to $800/cut

Today's Loop Provisioning & Hot Cut Processes & Performance Are Scaleable

- BellSouth can meet shift of entire current UNE-P demand to UNE loops under today's strict performance standards
  - Current CO workforce of about 3,000
  - 350 CO technicians could handle entire volume
  - Current provisioning centers already staffed for higher loop volumes with about 400 technicians
  - Workforce demand could be met today through current capacity, redeployment and overtime
  - Ainsworth/Milner affidavit (Attachment 6 to BellSouth Triennial Review reply comments)

Today's Loop Provisioning & Hot Cut Processes & Performance Are Scaleable (cont.)

- BellSouth has ramped up to meet CLEC demand before
  - Network workforce management is core competency
    - Local Carrier Service Centers
    - Provisioning centers
    - Collocation
- BellSouth workforce models for projecting staffing needed to meet CLEC volume increases approved in Florida third-party testing
- BellSouth regularly completes major projects that require much larger commitments of manual resources

Today's Loop Provisioning & Hot Cut Processes & Performance Are Scaleable (cont.)

- Transition of installed UNE-P base through deployment of additional teams in High Volume COs
- All Provisioning measures except order completion interval apply to bulk hot cuts
- CLECs pay UNE-P price until cutover occurs

Conversion of the Embedded UNE-P Base – Top 20 UNE-P Wire Centers

CO	UNE-P Bus Units	UNE-P Res Units	Total UNE-Ps	Months required to convert 100% of UNE-Ps to UNE-L and/or EELs	Months required to convert 30% of existing UNE-Ps to UNE-L and/or EELs	# of Collocation Arrangements by CLECs that are also providing UNE-Ps
HLWDFLPE Total	2,448	22,154	24,602	9.00	3.55	5
MIAMFLHL Total	3,177	12,883	16,060	7.73	2.32	4
HLWDFLWH Total	2,253	12,253	14,506	6.98	2.10	6
PRRNFLMA Total	2,433	10,647	13,080	6.30	1.89	4
MRTTGAMA Total	2,253	9,138	11,391	5.48	1.65	8
MIAMFLCA Total	1,290	9,843	11,133	5.36	1.61	2
PMBHFLCS Total	1,731	8,858	10,589	5.10	1.53	2
LRVLGAOS Total	1,414	7,982	9,396	4.52	1.36	2
MIAMFLWD Total	494	8,094	8,588	4.13	1.24	1
PMBHFLMA Total	2,258	6,205	8,463	4.07	1.22	5
WPBHFLGA Total	1,471	6,922	8,393	4.04	1.21	4
NDADFLBR Total	943	7,094	8,037	3.87	1.16	1
FTLDFLOA Total	1,358	6,675	8,033	3.87	1.16	3
FTLDFLJA Total	1,570	6,456	8,026	3.86	1.16	3
MIAMFLPL Total	5,353	1,912	7,265	3.50	1.05	4
WDSTGACR Total	1,165	6,014	7,179	3.46	1.04	2
FTLDFLPL Total	1,897	5,280	7,177	3.46	1.04	5
NDADFLAC Total	1,565	5,568	7,133	3.43	1.03	2
RSWLGAMA Total	1,391	5,515	6,906	3.33	1.00	7
SMYRGAMA Total	971	5,926	6,897	3.32	1.00	6
Total (Top 20 COs)	37,435	165,419	202,854			76
Grand Total (all COs)	576,297	821,002	1,397,299			898

NOTES: (1) Months required to convert 100% of UNE-Ps based on 2 shifts, except for HLWDFLPE, where some third shift work is included.
(2) Based on a mix of SL1 and SL2 loops.

Loop Provisioning Meets All Telecom Act Obligations And Provides No Basis For A Finding Of Switch Impairment

- Current process is efficient, reliable and scaleable
  - Network workforce management is core competency – BLS has ramped up before and will continue to do so
- Current processes and performance approved unanimously by 9 state PSCs and FCC in 271 proceedings
  - For example, "BellSouth provides hot cuts in Georgia and Louisiana within a reasonable time interval, at an acceptable level of quality, with minimal service disruption, and with a minimum number of troubles following installation." Ga/La Order at Para. 220 (footnotes omitted)
- Current standards and penalties ensure continued performance
  - $400 per affected transaction - penalty for missed cuts

Hot Cut and Collocation Prices Do Not Provide a Basis for Impairment

- State PSCs set TELRIC hot cut and collocation prices that reflect efficient processes and offerings
  - Approved in state and FCC 271 reviews
  - BellSouth SL1 hot cut rate $30-60/line
    - varies by state and # of lines, includes order coordination and service order charge
- Collocation offerings provide for choice of caged, cageless, shared and adjacent
  - CLECs can share collocation
  - Assembly room option available
- Collocation performance remains excellent
  - No missed due dates in October for BST region

Broad Use Of Collocation Shows That Collocation Is Not A Barrier To Switch Deployment

- 3,981 current CLEC collocations in BellSouth's 1,600 offices
  - 85% of UNE-Ps in COs with collocation
- Virtual collocation available in every CO
- Physical collocation not currently available in 3 offices accounting for less than .1% of UNE-Ps

Proper Framework For UNE-P Transition Creates Incentives For Parties To Implement Pro-consumer Transition Quickly and Efficiently

- CLECs have leverage to bargain effectively over market alternatives to UNE-P
  - Loop provisioning is efficient, reliable and scaleable
    - Current performance standards, automatic penalties and complaint proceedings, if necessary, guarantee that CLECs can cutover to UNE loops
- ILECs have incentives to keep CLECs on network
- Elimination of UNE-P focuses parties on commercial solutions and implementation
  - Further proceedings prior to removing UNE-P creates incentives to concoct problems rather than to solve them

Backup

Hot Cut Rates - First

Hot Cut Option	Cost Ref. No.	Rate Elements	AL	FL	GA	KY	LA	MS	NC	SC	TN
1	SL1 LOOP										
	A.1.1	SL1 Loop NRC (1st)	$37.81	$49.97	$42.84	$46.[illegible]	$38.54	$37.82	$38.54	$37.82	$31.[illegible]
	N.1.1	Electronic Service Order	$5.63	$1.82	$0.56	$7.[illegible]	$2.[illegible]	$5.70	$2.[illegible]	$5.62	$0.00
		TOTAL SL1 Loop Hot Cut (1st)	$43.[illegible]	$51.[illegible]	$43.[illegible]	$54.54	$38.[illegible]	$43.[illegible]	$38.[illegible]	$43.[illegible]	$31.[illegible]
2	SL1 LOOP with Order Coordination										
	A.1.1	SL1 Loop NRC (1st)	$37.81	$49.97	$42.84	$46.[illegible]	$38.54	$37.82	$38.54	$37.82	$31.[illegible]
	N.1.5	Order Coordination	$8.15	$0.00	$16.11	$0.00	$7.62	$8.30	$7.62	$8.17	$38.52
	N.1.1	Electronic Service Order	$5.63	$1.82	$0.56	$7.[illegible]	$2.[illegible]	$5.70	$2.[illegible]	$5.62	$0.00
		TOTAL SL1 Loop Hot Cut (1st)	$51.79	[illegible]	$59.39	$63.54	$47.44	$51.[illegible]	$47.44	$52.01	$68.51
3	SL1 LOOP with Order Coordination and OC for Specified Conversion Time										
	A.1.1	SL1 Loop NRC (1st)	$37.81	$49.97	$42.84	$46.[illegible]	$38.54	$37.82	$38.54	$37.82	$31.[illegible]
	N.1.5	Order Coordination	$8.15	$0.00	$16.11	$0.00	$7.62	$8.30	$7.62	$8.17	$38.52
	N.1.8	Order Coordination for Specified Conversion Time	$18.0[illegible]	$23.02	$35.74	$23.01	$17.[illegible]	$18.18	$17.[illegible]	$18.13	$34.2[illegible]
	N.1.1	Electronic Service Order	$5.63	$1.82	$0.56	$7.[illegible]	$2.[illegible]	$5.70	$2.[illegible]	$5.62	$0.00
		TOTAL SL1 Loop Hot Cut (1st)	[illegible]	$83.11	[illegible]	[illegible]	[illegible]	$70.[illegible]	[illegible]	$78.14	$102.[illegible]
4	SL2 LOOP (Order Coordination Included in Loop NRC)										
	A.1.2	SL2 Loop NRC (1st)	[illegible]	$135.7[illegible]	$104.17	$134.[illegible]	$102.10	$106.[illegible]	$102.10	$106.[illegible]	$75.0[illegible]
	N.1.1	Electronic Service Order	$5.63	$1.82	$0.56	$7.[illegible]	$2.[illegible]	$5.70	$2.[illegible]	$5.62	$0.00
		TOTAL SL2 Loop Hot Cut (1st)	[illegible]	$137.27	$104.73	$142.77	$105.[illegible]	$111.[illegible]	$105.[illegible]	$111.[illegible]	$75.0[illegible]
5	SL2 LOOP (Order Coordination Included in Loop NRC) with OC for Specified										
	A.1.2	SL2 Loop NRC (1st)	[illegible]	$135.7[illegible]	$104.17	$134.[illegible]	$102.10	$106.[illegible]	$102.10	$106.[illegible]	$75.0[illegible]
	N.1.8	Order Coordination for Specified Conversion Time	$18.0[illegible]	$23.02	$35.74	$23.01	$17.[illegible]	$18.1[illegible]	$17.[illegible]	$18.13	$34.2[illegible]
	N.1.1	Electronic Service Order	$5.63	$1.82	$0.56	$7.[illegible]	$2.[illegible]	$5.70	$2.[illegible]	$5.62	$0.00
		TOTAL SL2 Loop Hot Cut (1st)	$111.[illegible]	$160.[illegible]	$140.[illegible]	$165.78	$122.[illegible]	$130.[illegible]	$122.[illegible]	$130.[illegible]	$109.36

Hot Cut Rates - Additional

Hot Cut Option	Cost Ref. No.	Rate Elements	AL	FL	GA	KY	LA	MS	NC	SC	TN
1	SL1 LOOP										
	A.1.1	SL1 Loop NRC (Add'l)	$17.[illegible]	$22.6[illegible]	$31.5[illegible]	$22.57	$16.87	$17.[illegible]	$16.87	$17.6[illegible]	$20.02
	N.1.1	Electronic Service Order	$5.6[illegible]	$1.52	$0.5[illegible]	$7.[illegible]	$2.[illegible]	$[illegible].70	$2.[illegible]	$5.[illegible]	$0.00
		TOTAL SL1 Loop Hot Cut (Add'l)	$[illegible]	$24.35	$31.[illegible]	$30.45	$18.[illegible]	$[illegible]	$18.[illegible]	$[illegible]	$[illegible]
2	SL1 LOOP with Order Coordination										
	A.1.1	SL1 Loop NRC (1st)	$17.[illegible]	$22.6[illegible]	$31.5[illegible]	$22.5[illegible]	$16.87	$17.[illegible]	$16.87	$17.6[illegible]	$20.02
	N.1.5	Order Coordination	$[illegible].1[illegible]	$[illegible]	$16.11	$[illegible]	$7.[illegible]	$[illegible]	$7.92	$[illegible].17	$[illegible]
	N.1.1	Electronic Service Order	$[illegible]	$1.52	$[illegible]	$7.[illegible]	$2.[illegible]	$[illegible].70	$2.[illegible]	$[illegible]	$0.00
		TOTAL SL1 Loop Hot Cut (Add'l)	$21.64	$[illegible]	$47.[illegible]	$[illegible]	$27.77	$21.4[illegible]	$27.77	$21.71	$[illegible]
3	SL1 LOOP with Order Coordination and OC for Specified Conversion Time										
	A.1.1	SL1 Loop NRC (1st)	$17.[illegible]	$22.6[illegible]	$31.5[illegible]	$22.57	$16.87	$17.[illegible]	$16.87	$17.6[illegible]	$20.02
	N.1.5	Order Coordination	$[illegible].1[illegible]	$[illegible]	$16.11	$[illegible]	$7.[illegible]	$[illegible]	$7.92	$[illegible].17	$[illegible]
	N.1.9	Order Coordination for Specified Conversion Time	$18.0[illegible]	$23.02	$35.74	$23.01	$17.5[illegible]	$18.1[illegible]	$17.5[illegible]	$18.13	$34.2[illegible]
	N.1.1	Electronic Service Order	$5.6[illegible]	$1.52	$[illegible]	$7.[illegible]	$2.[illegible]	$[illegible].70	$2.[illegible]	$5.[illegible]	$0.00
		TOTAL SL1 Loop Hot Cut (Add'l)	$[illegible]	$[illegible].37	$[illegible].73	$[illegible]	$45.33	$[illegible]	$45.32	$[illegible]	$[illegible]
4	SL2 LOOP (Order Coordination Included in Loop NRC)										
	A.1.2	SL2 Loop NRC (1st)	$56.00	$82.47	$76.10	$[illegible]	$[illegible].72	$[illegible]	$[illegible].72	$[illegible]	$4[illegible].20
	N.1.1	Electronic Service Order	$5.6[illegible]	$1.52	$[illegible]	$7.[illegible]	$2.[illegible]	$[illegible].70	$2.[illegible]	$5.[illegible]	$0.00
		TOTAL SL2 Loop Hot Cut (Add'l)	$[illegible]	$[illegible]	$76.[illegible]	$[illegible]	$[illegible].70	$7[illegible]	$[illegible].70	$74.[illegible]	$4[illegible].20
5	SL2 LOOP (Order Coordination Included in Loop NRC) with OC for Specified										
	A.1.2	SL2 Loop NRC (1st)	$56.00	$82.47	$76.10	$[illegible]	$[illegible].72	$[illegible]	$[illegible].72	$[illegible]	$4[illegible].20
	N.1.9	Order Coordination for Specified Conversion Time	$18.0[illegible]	$23.02	$35.74	$23.01	$17.5[illegible]	$18.1[illegible]	$17.5[illegible]	$18.13	$34.2[illegible]
	N.1.1	Electronic Service Order	$5.6[illegible]	$1.52	$0.5[illegible]	$7.[illegible]	$2.[illegible]	$[illegible].70	$2.[illegible]	$5.[illegible]	$0.00
		TOTAL SL2 Loop Hot Cut (Add'l)	$76.[illegible]	$107.[illegible]	$114.[illegible]	$112.7[illegible]	$[illegible]	$[illegible].17	$[illegible]	$[illegible]	$[illegible]